

Message

From: Gupta, Prashant K [Prashant.Gupta@Honeywell.com]
Sent: 3/1/2021 9:18:27 PM
To: Pope, Robert [Pope.Robert@epa.gov]; kkessler [kkessler@montrose-env.com]
CC: Monroy, Gina [Monroy.Geraldine@epa.gov]; Timmerly Bullman [tbullman@montrose-env.com]
Subject: RE: [External] RE: Feedback on one issue in the BRA Memo

Rob, ok Friday except 10-11 and 2-3 for us.

Prashant K. Gupta
Remediation Manager
Honeywell
Remediation and Redevelopment Group
973-722-1656 (cell)

Prashant.Gupta@Honeywell.com
www.Honeywell.com

From: Pope, Robert <Pope.Robert@epa.gov>
Sent: Monday, March 1, 2021 11:25 AM
To: kkessler <kkessler@montrose-env.com>; Gupta, Prashant K <Prashant.Gupta@Honeywell.com>
Cc: Monroy, Gina <Monroy.Geraldine@epa.gov>; Timmerly Bullman <tbullman@montrose-env.com>
Subject: [External] RE: Feedback on one issue in the BRA Memo

How about Friday? I'm swamped this week.

Sincerely,

Robert H. Pope, Acting Chief
Technology Integration and Information Branch
Technology Innovation and Field Services Division
Office of Superfund Remediation and Technology Innovation (OSRTI)
(404) 562-8506 work
(404) 272-5799 mobile

From: Kirk Kessler <kkessler@montrose-env.com>
Sent: Monday, March 1, 2021 9:39 AM
To: Pope, Robert <Pope.Robert@epa.gov>; Gupta, Prashant K <prashant.gupta@honeywell.com>
Cc: Monroy, Gina <Monroy.Geraldine@epa.gov>; Timmerly Bullman <tbullman@montrose-env.com>
Subject: RE: Feedback on one issue in the BRA Memo

Rob – your bullet list from the previous conference call is consistent with our notes.

Can we schedule a time this week (I was on PTO latter part of last week) to discuss the last 2 entries on the 2-24 email table of comments/responses/EPD response.

From: Pope, Robert <Pope.Robert@epa.gov>
Sent: Monday, March 1, 2021 8:30 AM
To: Gupta, Prashant K <prashant.gupta@honeywell.com>
Cc: Kirk Kessler <kkessler@montrose-env.com>; Monroy, Gina <Monroy.Geraldine@epa.gov>; Timmerly Bullman

<tbullman@montrose-env.com>

Subject: RE: Feedback on one issue in the BRA Memo

Good morning,

Checking in to make sure you agree the bullets below capture the conversation accurately. EPA needs a response in order to ensure the forthcoming comments match the agreements. Also, I forwarded you the GEPD feedback on the RTC on the BRA Memo. Please let me know if there are any issues as their comments and feedback will be included in the forthcoming final comment letter.

Sincerely,

Robert H. Pope, Acting Chief
Technology Integration and Information Branch
Technology Innovation and Field Services Division
Office of Superfund Remediation and Technology Innovation (OSRTI)
(404) 562-8506 work
(404) 272-5799 mobile

From: Pope, Robert

Sent: Tuesday, February 23, 2021 5:33 PM

To: Prashant Gupta (prashant.gupta@honeywell.com) <prashant.gupta@honeywell.com>

Cc: Kirk Kessler <kkessler@montrose-env.com>; Monroy, Gina <Monroy.Geraldine@epa.gov>; Koporec, Kevin <Koporec.Kevin@epa.gov>; Timmerly Bullman <tbullman@montrose-env.com>

Subject: RE: Feedback on one issue in the BRA Memo

Hi Prashant,

I'm going to summarize below where we ended up and some next steps from our discussion today:

- EPA will issue our comments with GEPD's on the BRA Memo
- It is agreed that enough data exists for mercury in surface soil to proceed with calculating a risk in a standard way
- It was further agreed that there more data is needed to calculate risk in a standard way for other COCs including VOCs and SVOCs
- To address this data gap, a workplan will be submitted for sampling where the soil cover thickness is less than 2 feet
- EPA will review the workplan and comment (if needed) to ensure it will meet the need
- The BRA Memo will be finalized noting the data gap and the work plan to address the data gap and that information will be presented in the upcoming RI and
- A workplan to dismantle the CO2 injection system with justification based on the results of the CO2 injection and groundwater sampling results will be submitted
- Once the workplan is approved, a proposal will be submitted to adjust the financial assurance for the Removal Order.

Please let me know if you agree this summarizes our discussion and the next steps.

Sincerely,

Robert H. Pope, Acting Chief
Technology Integration and Information Branch
Technology Innovation and Field Services Division
Office of Superfund Remediation and Technology Innovation (OSRTI)
(404) 562-8506 work
(404) 272-5799 mobile

From: Pope, Robert

Sent: Friday, February 19, 2021 2:06 PM

To: Prashant Gupta (prashant.gupta@honeywell.com) <prashant.gupta@honeywell.com>

Cc: Kirk Kessler <kkessler@montrose-env.com>; Monroy, Gina <Monroy.Geraldine@epa.gov>; Koporec, Kevin <Koporec.Kevin@epa.gov>

Subject: Feedback on one issue in the BRA Memo

Hi Prashant and Kirk,

I have some feedback from Kevin Koporec on one issue that I wanted to share before EPA provides our final comments on the BRA Memo. Please see below.

"I have reviewed the responses to our (EPA) comments (RTCs).

I do not agree with the response to our General Comment #1. Here is the specific portion of the Response with which I disagree:

"To address the concern over the limited number of historical samples that classify as surface soil, we plan to use the historical data that is currently located from the ground surface to 5 ft bgs (the "mixed soil" horizon) to represent both surface soil and the mixed soil zones. This is reasonable as we would not anticipate that the condition in the surface soil zone (0-2 ft bgs) would be significantly different from the mixed soil zone (0-5 ft bgs). This adjustment is also inherently conservative as it does not account for the presence of the clean soil cover that is placed over the majority of the exposure unit."

I do not agree with this proposed approach, as we should NOT be using soil data that is based on samples collected deeper than 2 feet to assess any direct contact with surface soil in an exposure scenario such as an Onsite Industrial/Commercial worker. It does not matter that the approach seems to be "conservative" if the exposure is not realistic. If the majority of the exposure area for this Onsite Worker is comprised of the soil cover area, and assuming we know that the cover soil does not have any of our site COPCs at levels of health concern, we should use a Fraction Ingested (FI) approach for this scenario. That means we would use an FI value that represents the fraction of the Exposure Area for this receptor that is not covered by the soil cover.

Note: It appears that changes necessitated by this change to what PRPs proposed will also affect the RTC for General Comment #4 which refers to the soil data in the "mixed soil horizon".

Please let me know if your risk assessment team understands the feedback and can address the issue or if we need to have a meeting with the risk assessors to go over the issue. Once this is resolved, EPA plans to provide the full feedback from EPA and GEPA and we can move forward with finalizing the BRA memo.

Sincerely,

Robert H. Pope, Acting Chief

Technology Integration and Information Branch

Technology Innovation and Field Services Division

Office of Superfund Remediation and Technology Innovation (OSRTI)

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(404) 272-5799 mobile

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